

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

PARAGON DATA SYSTEMS, INC.,

Plaintiff,

v.

CINTAS CORPORATION, *et al.*,

Defendants.

Civil Action No. 1:20-cv-01883

District Judge: Dan Aaron Polster

Magistrate Judge: David Ruiz

SAP AMERICA INC.’S MOTION FOR CIVIL CONTEMPT SANCTIONS

Defendant SAP America, Inc. (“SAP”) moves this Court to grant its motion for civil contempt sanctions in the above captioned case, on the grounds that Paragon Data Systems, Inc. (“Paragon”) violated the Protective Order in this case in the filing of a new case on October 12, 2022 in the Court of Common Pleas.

For the reasons set for in the attached memorandum of points and authorities in support of SAP’s motion for civil contempt sanctions, this court should grant SAP’s motion.

In support of this Motion, SAP attaches its Memorandum of Points and Authorities in Support.

WHEREFORE, SAP asks this Court to grant its motion.

Dated: November 16, 2022

JONES DAY

By: /s/ Thomas R. Goots

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